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*NATIONAL ASSOCIATION, as Trustee*  
 8

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 LAS VEGAS DEVELOPMENT GROUP, )  
 LLC, a Nevada Limited Liability )  
 12 Company, )

13 Plaintiff, )

14 v. )

15 SRMOF II 2012-1 TRUST, US BANK )  
 TRUST NATIONAL ASSOCIATION, as )  
 16 Trustee, an unknown business entity; )  
 MTC FINANCIAL INC. dba TRUSTEE )  
 17 CORPS, a California corporation, DOE )  
 individuals I through XX, ROE )  
 18 CORPORATIONS I through XX, inclusive, )

19 Defendants. )

CASE NO. 2:13-cv-02194-APG-VCF

**JOINT MOTION TO EXTEND TIME TO  
 FILE DISCOVERY PLAN**

20  
 21 Plaintiff LAS VEGAS DEVELOPMENT GROUP, LLC, ("Plaintiff") and  
 22 Defendant U.S. Bank National Association, as Trustee for SRMOF II 2012-1 Trust,  
 23 ("U.S. Bank" and collectively "the Parties"), by and through their undersigned  
 24 counsel of record, hereby submit their Joint Motion to Extend Time to File Discovery  
 25 Plan, stating as follows:

26 1. The instant action is primarily a declaratory judgment and quiet title-  
 27 type action related to the force, effect and interpretation of NRS 116.3116 et seq. The  
 28

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1 real property at issue herein is commonly known as 5259 Aurora Beam Avenue, Las  
2 Vegas, Nevada 89122.

3 2. This action was originally filed in the Eighth Judicial District Court of  
4 Clark County, Nevada, but subsequently removed to this Court by the United States  
5 Attorney on behalf of the Department of Housing and Urban Development (“HUD”).  
6 HUD subsequently disclaimed any interest in the Property or the deed of trust at  
7 issue pursuant to a Stipulation and Order entered herein on February 13, 2014 [Dkt  
8 No. 9]. HUD was dismissed from the action pursuant to said Stipulation and Order  
9 and a Second Amended Complaint was filed.

10 3. On February 27, 2015, Ballard Spahr LLP associated in as counsel of  
11 record for Defendant U.S. Bank, N.A. as Trustee for SRMOF II 2012-1 Trust [Dkt.  
12 27]. That same day, the parties submitted a Joint Status Report in response to the  
13 Court’s January 29, 2015 Notice Regarding Intent to Dismiss for Want of Prosecution  
14 [Dkt. 28].

15 4. In response to the parties’ Joint Status Report, on March 3, 2015, the  
16 Court issued a Minute Order directing the parties to submit a proposed discovery  
17 plan and scheduling order by March 30, 2015.

18 5. Ballard Spahr LLP has reason to believe that one or more entities other  
19 than or in addition to the currently named Defendant possesses or claims to possess  
20 an interest in the real property and/or deed of trust at issue herein.

21 6. Although Ballard Spahr LLP has made diligent efforts to determine the  
22 correct entity or entities to be named, it has received conflicting information and has  
23 not yet determined who holds an interest in the property.

24 7. As a result of this conflicting information, Ballard Spahr LLP has not  
25 yet been able to prepare and file a responsive pleading herein.

26 8. In order to provide sufficient time to identify and prepare an answer on  
27 behalf of the correct entity, the parties hereby agree to extend the deadline to amend  
28 their respective pleadings as necessary, conduct a supplemental 26(f) conference and

1 submit a discovery plan and scheduling order by an additional 30 days from the date  
2 of the filing of this Joint Motion.

3 DATED this 30<sup>th</sup> day of March, 2015.

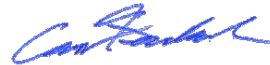
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5 ROGER P. CROTEAU &  
ASSOCIATES, LTD.

6 By: /s/ Timothy Rhoda  
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*Association, as Trustee*

12  
13 IT IS SO ORDERED

14 

15 U.S. MAGISTRATE JUDGE  
16 DATE: March 31, 2015

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